

# REMARKS

Claims 1-3 and 6-23 are pending and under consideration.

The Examiner rejects claims 1-3 and 6-23 under 35 U.S.C. §103(a) as being unpatentable over Thompson et al. (U.S.P. 5,809,433) or Ying et al. (U.S.P. 6,442,400) in view of Jeong et al. (U.S.P. 6,256,481). The rejections are traversed.

Independent claim 1 recites an input device including "a first detachable upper cover that is swappable with a second detachable upper cover, wherein said antenna is arranged inside each of said detachable upper covers at an uppermost portion of the housing, . . . wherein said antenna is detachably connected to said communicating part by a connector and detachable from the case along with each of the detached upper covers (emphasis added)."

Independent claim 11 recites a wireless input device including "a first detachable upper cover . . . that is swappable with a second detachable upper cover; and an antenna . . . detachable from the case along with each of the detached upper covers(emphasis added)."

Independent claim 20 recites a wireless input device wherein "the first detachable upper cover includes an antenna to wirelessly transmit data, the antenna arranged within an inner volume of the first detachable upper cover or formed on a surface of the first detachable upper cover (emphasis added)."

Independent claim 23 recites a cover for a wireless input including "an antenna in a first arrangement arranged within an inner volume of the cover or formed on a surface of the cover, wherein the cover is swappable with another cover having an antenna in a second arrangement (emphasis added)."

The Action concedes that neither Thompson nor Ying teaches a detachable upper cover. However, the Examiner supports the rejections contending that Jeong teach a detachable upper cover (200) and that it would have been obvious:

to have modified Thompson et al with the teaching of Jeong et al, since Thompson et al have disclose (has disclosed) the cover (103) connected to the housing(101 or 102) by a hinge . . . and a user could be easy to (easily) exchange the cover that he/she desired.

and that would have been obvious:

to have modified Ying et al with the teaching of Jeong et al, since Ying et al have disclose (has disclosed) the cover(14) connected to the housing(12) by a hinge(26). . . and a user could be easy to (easily) exchange the cover that he/she desired.

(Emphasis added, Action at pages 3 and 5).

### **Recited Features Not Taught By The Cited Art, Alone or in Combination**

As set forth in MPEP §2143.03 "To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art."

Applicant submits that none of the art, alone or in even in an *arguendo* combination teach both a detachable antenna and the detachable antenna connected with a swappable cover, as recited by claims 1, 11, 20, and 23.

In addition to not teaching a detachable upper cover, Thompson does not teach a detachable antenna, but rather:

The second housing portion 103 includes an antenna 107, referred to herein as a keypad cover antenna, which is a diversity antenna with mast antenna 110. The keypad cover antenna 107 is positioned between a front keypad cover housing section 111 (FIG. 5) and a back keypad cover housing section 112 (and thus is illustrated in phantom in FIG. 1). . . . The keypad cover antenna 107 is sandwiched between these keypad cover housing sections when the keypad cover is fully assembled.

(Emphasis added, col. 3, lines 20-35).

That is, Thompson teaches an antenna that is sandwiched between housing sections. Ying teaches (see, col. 4, lines 33-35) that:

The portions 42 and 44 are electrically connected to each other and to the radio circuitry inside the apparatus housing 12 through an opening 45 in the flip 14.

That is, Ying also teaches that the antenna is not detachable.

In addition, the "flip cover 200" taught by Jeong does not include an antenna. Rather Jeong teaches that the antenna is separate from the "flip cover 200" and mounted so (col. 4, lines 12-15) "portable telephone 300 includes an antenna unit 101 installed in an upper portion thereof."

### **No Reasonable Chance Of Success To Combine the Art**

In addition, Applicant submits there is no motivation or reasonable chance of success to modify the art as the Examiner contends. As set forth in MPEP §2144. 04:

The mere fact that a worker in the art could rearrange the parts of the reference device . . . is not by itself sufficient to support a finding of obviousness. The prior art must provide a motivation . . . without the benefit of appellant's specification, to make the necessary changes in the reference device.

Applicant points out, for example, that each of the keypad cover antennas, e.g., 107 and arranged in the cover 103 of the cellular phone discussed in Thompson is connected to the transceiver circuit 515 mounted in the main body 101. Thus, one of ordinary skill in the art would

not have found it possible to take the cover 103 off and exchange such a cover with another cover as taught by Jeong.

In addition as recited by claim 23, the cover is swappable with another cover having an antenna in a "second arrangement." Applicant submits that none of the cited art, alone or in combination teach a swappable cover having an antenna in a "second arrangement," nor has the Examiner provided a citation to such a "second arrangement" in the art currently relied on.

### Summary

Since features recited by independent claims 1, 12, 20, and 23 (and respective dependent claims 2-3, 6-10, and 14-16; 12 and 17-19; and 21-22) are not taught by the cited art, alone or in combination, and there is no reasonable chance of success to combine the art in a manner as the examiner contends, and *prima facie* obviousness is not established, the rejection should be withdrawn and claims 1-3 and 6-23 allowed.

### CONCLUSION

There being no further outstanding objections or rejections, it is submitted that the application is in condition for allowance. An early action to that effect is courteously solicited.

Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

STAAS & HALSEY LLP

Date: June 20, 2006

By: Paul W. Bobowiec  
Paul W. Bobowiec  
Registration No. 47,431

1201 New York Avenue, NW, 7th Floor  
Washington, D.C. 20005  
Telephone: (202) 434-1500  
Facsimile: (202) 434-1501